

EXHIBIT H

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

VICKI HALE, *et al.*

Plaintiffs,

V.

WILLIAM LEE, *et al.*,

Defendants.

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Case No. 3:26-cv-00603
[Lead Case]

TENNESSEE STATE CONFERENCE
OF THE NAACP, *et al.*

Plaintiffs,

V.

TRE HARGETT, *et al.*,

Defendants.

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Case No. 3:26-cv-00638
[Consolidated Case]

DECLARATION OF DEBRA GOULD

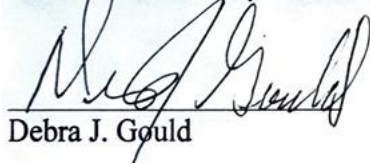
I, Debra Gould, having been duly sworn, do hereby swear and affirm as follows:

1. I am over the age of 18 years, have personal knowledge of the matters stated herein, am competent to make this declaration, and would testify to the same if called as a witness in Court.
2. I am the President of the League of Women Voters of Tennessee ("LWVTN"). I have served in that position for three years.
3. The League of Women Voters was founded in 1920 and is a nonpartisan, grassroots nonprofit dedicated to empowering everyone to fully participate in our democracy and has Leagues in all 50 states and more than 800 Leagues across the country. The League of Women Voters engages in advocacy, education, litigation, and organizing to protect every American's freedom to vote.

4. LWVTN was founded in 1920. LWVTN is a volunteer-led nonpartisan 501(c)(3) political organization which encourages informed and active participation of Tennesseans in government and influences public policy through education and advocacy.
5. LWVTN is an affiliate organization of the League of Women Voters of the U.S.
6. LWVTN is a volunteer organization with over 1,000 members statewide, spread out amongst nine local leagues with additional members at large across the state of Tennessee.
7. League members, including communities of color, reside in each of the three challenged districts in Shelby County. The League of Women Voters of Memphis/Shelby County has members in Congressional District 5, 8, and 9.
8. The League of Women Voters of Williamson County and the League of Women Voters of Murfreesboro-Rutherford County have members in the redrawn Districts 5 and 9.
9. The League of Women Voters of Memphis/ Shelby County are regularly engaged in non-partisan activities that include voter registration, candidate forums, public policy forums, and events. These activities reflected the interests and concerns of their urban community with its majority-minority population. Due to the new redistricting plan, they will have to devote additional time and resources to educate their members and the public about the new congressional districts in Shelby County.
10. In 2022 in preparation for the regularly scheduled redistricting process, LWVTN, NAACP, and other non-partisan organizations conducted focus groups across the state to learn what redistricting priorities the public wanted. The message was clear. The priorities were twofold: provide urban representation for urban areas and rural representation for rural areas and keep communities whole. The newly redrawn Congressional Districts 5, 8, and 9 do not meet either criterion.
11. The League of Women Voters of Memphis/Shelby County and LWVTN through their advocacy and voter outreach continually encourage members of the public to communicate directly with their elected local, state, and federal officials about public policy issues that impact their communities. By trisecting Memphis/Shelby County, the Tennessee legislature has eliminated the ability of the community as a whole to effectively communicate about the issues that matter most to their congressional representative.
12. The redrawn congressional districts that fracture Memphis/Shelby County into Congressional Districts 5, 8, and 9, have an impact on the rest of the state as well. There are significant changes in the shape of Congressional Districts 4, 6 and 7. These changes that were made so close the August 2026 create a significant organizational burden for LWVTN in our primary mission of providing voters with the information they need prior to an election.

13. As a result of the new redistricting plan, LWVTN will have greater difficulty in conducting civic engagement activities. Because the new plan has led to chaos and confusion for the public, many Tennessee voters are unaware of their newly assigned districts. The legislation creating the challenged districts specifically lifted the requirement that local election commissions must notify voters of this change by mail. LWVTN will need to conduct new and novel forms of outreach to inform voters of these changes in the brief remaining timeline before the August 2026 primary.
14. The League of Women Voters of Memphis/Shelby County provides educational resources and voting information for residents of Shelby County. With the newly redrawn Congressional Districts 5, 8, and 9, LWVTN and the League of Women Voters of Memphis/Shelby County must now distribute information from Memphis to Williamson County. That area includes largely rural areas that do not have local newspapers or traditional media outlets with a broad coverage, thereby creating a huge communications and outreach challenge for LWVTN.
15. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of June 2026 in Nashville, TN.



Debra J. Gould